

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

EPSILON ENERGY USA, INC.,	:	
	:	
Plaintiff,	:	
	:	
v.	:	NO. 1:21-cv-00433
	:	
CHESAPEAKE APPALACHIA, L.L.C.,	:	JUDGE WILSON
	:	
	:	
Defendant.	:	ELECTRONICALLY FILED

**NOTICE OF RELATED FILINGS IN FORM OF EMERGENCY MOTION
TO ENFORCE BANKRUPTCY CONFIRMATION ORDER**

Defendant Chesapeake Appalachia, L.L.C. (“Chesapeake”) hereby provides the Court with Notice of Related Filings in the United States Bankruptcy Court for the Southern District of Texas as follows:

1. On March 8, 2021, two days before commencing this action, Epsilon Energy USA, Inc. (“Epsilon”) filed a Reservation of Rights to Assert Administrative Expense Claim in the United States Bankruptcy Court for the Southern District of Texas (ECF No. 3186) in the matter captioned *In re: Chesapeake Energy Corporation, et al.*, Case No. 20-33233 (DRJ). A true and correct copy of Epsilon’s Reservation of Rights to Assert Administrative Expense Claim is attached hereto as Exhibit A.

2. On March 24, 2021, Chesapeake filed a Reorganized Debtor's Emergency Motion to Enforce Confirmation Order (ECF No. 3310) (the "Emergency Motion") in the United States Bankruptcy Court for the Southern District of Texas in the matter captioned *In re: Chesapeake Energy Corporation, et al.*, Case No. 20-33233 (DRJ). In the Emergency Motion, the Reorganized Debtor asserts, *inter alia*, that Epsilon's action in this Court violates the injunction provisions of the Bankruptcy Court's Plan and Confirmation Order. A true and correct copy of the Emergency Motion is attached hereto as Exhibit B.

3. A hearing on the Emergency Motion will occur in the United States Bankruptcy Court for the Southern District of Texas on Tuesday, March 30, 2021 at 11:30 am CST. (*See* Emergency Motion at 1).

WHEREFORE, Chesapeake Appalachia L.L.C. hereby provides the Court

with Notice of Related Filings in the United States Bankruptcy Court for the Southern District of Texas.

Respectfully submitted:

/s/ John B. Dempsey

Daniel T. Brier

John B. Dempsey

Nicholas F. Kravitz

Richard L. Armezzani

Myers, Brier & Kelly, LLP
425 Spruce Street, Suite 200
Scranton, PA 18503
(570) 342-6100

Attorneys for Defendant, Chesapeake
Appalachia, L.L.C.

Dated: March 25, 2021

CERTIFICATE OF SERVICE

I, John B. Dempsey, hereby certify that a true and correct copy of the foregoing Notice of Related Filings was served upon the following counsel of record via electronic mail on this 25th day of March 2021:

Gregory J. Krock, Esquire
Elizabeth M. Thomas, Esquire
McGuireWoods LLP
Tower Two-Sixty
Pittsburgh, PA 15222

Johnathan T. Blank, Esquire
McGuireWoods LLP
Peter Jefferson Parkway, Suite 350
Charlottesville, VA 22911

/s/ John B. Dempsey
John B. Dempsey